

Subject: CCNS comments on SWQMP
Fwd: CCNS comments on SWQMP
Date: Fri, 28 Feb 2003 16:31:58 -0700
From: Joni Arends <jarends@nuclearactive.org>
To: stephanie_stringer@nmenv.state.nm.us

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Bcc:

X-Attachments:

February 28, 2003

Stephanie Stringer
NMED SWQB
P. O. Box 26110
Santa Fe, NM 87502

Dear Ms. Stringer,

Concerned Citizens for Nuclear Safety (CCNS) makes the following comments on the Proposed Revisions to the Statewide Water Quality Management Plan (January 14, 2003) (SWQMP), tentatively set for consideration by the Water Quality Control Commission (Commission) on April 8, 2003. On February 28, 2003 CCNS requested a hearing before the Commission on the proposed revisions, but would appreciate the opportunity to review the changes before a statement to present technical testimony is due to see if such a hearing will be necessary.

CCNS appreciates the work done by the Surface Water Quality Bureau (SWQB) to improve the SWQMP and the extra effort on your part.

A. Introduction.

CCNS would request that Section IV ³Water Quality Standards,² (pages 23-29) of the Colorado Water Quality Management and Drinking Water Protection Handbook, Commission Policy #98-2, Updated October 15, 2002, Expiration Date December 31, 2006 be modified for New Mexico and incorporated into the proposed revisions of the SWQMP.

CCNS requests a paragraph or two about the Continuing Planning Process (CPP) be included in the Introduction.

In the third paragraph under ³Institutional Roles and Responsibilities,² CCNS requests that the language found in the January 8, 2003 version, regarding the Commission include its quasi-judicial role, be reinserted.

It would be helpful in this section to include the website of the Commission.
It would be helpful to include the five programs that fall under the Ground Water Quality Bureau in that section.

Please reinsert sentences found in the January 8, 2003 version about the SWQB's responsibility for maintaining and revising the CPP and SWQMP.

B. Work Element 11.

With respect to the Public Participation Program, CCNS requests an explanation why the Work Element has been limited to federal Clean Water Act programs administered by the NMED. In addition, a listing of those programs would be helpful to the public.

CCNS appreciates the inclusion of the Public Participation requirements in the table format.

Should you have any questions or comments, please contact me.

Sincerely,

Joni Arends
Waste Programs Director

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Waste Programs Director
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